

March 1, 2010

To: CT General Assembly
Committee on Public Health

From: Jane Maher 10 Knorr Road Oxford, CT 06478
Executive Board Member CTNOFA (Northeast Organic Farming Association)
Specialty Food Manufacturer and Consultant

Re: Raised Bill No. 5287

An Act Allowing the Production and sale of Acidified Food products on Residential Farms

I represent over 800 members of CTNOFA, consisting of many local farmers, landscape professionals, gardeners & consumers who unanimously support this bill. And, until very recently I was a small food manufacturer called "Snootyfood" in Oxford CT. I specialized in natural and organic products like chutney, herb butters and dips, but my top seller has always been my garlicky-dill pickles. .

I had made refrigerator/acidified pickles at home for years, pickled everything, which eventually turned into a business. I've been in business for five years, with a fully operational commercial kitchen, approved for manufacturing by Kevin Gallagher of The State Dept. of Consumer Protection. I had accounts at Whole Foods Market from Boston to NYC, Highland Park Market, various Health Food Stores, restaurants, and many, many farmer's markets throughout CT.

I have had to close my business and one reason being that the overhead of the commercial kitchen was very high, while my pickle sales were typically seasonal.

I am not a farmer, but buy a lot of ingredients from them, and I'm on my way to becoming a good organic vegetable gardener and an expert in food preservation. I'm a huge advocate of the local food movement, farmers, and local producers. I am currently serving on the executive board of CTNOFA and also founded the annual "Made in CT Fair" held in Oxford each fall. I've also won several awards from the CT Specialty Food Association.

Acidified foods are one of the safest food categories on the market for the consumer. I receive every food recall alert from the FDA and FSIS and not once has it been for an acidified food.

In the case of the Snootyfood pickle, the presence of approximately a 25-30% solution of vinegar, sea salt, citric acid (vitamin C), water that has been boiled, then cooled, (misc. spices and garlic) plus refrigeration, is extremely, extremely safe.

I had my first two food products tested for safety at Northeast Laboratories in Berlin, CT in or around the summer of 2004. I had many phone conversations over the months with Alan Johnson the director there. When I mentioned that I would next be bringing in samples for testing my pickles and chutney, Alan asked about my process-how I made both products-he discouraged me from even spending the \$110 each for testing each product.

He explained that when testing food, they place samples in a "worst case scenario" for shelf life. i.e. for a dairy product, they would be placed in an open refrigerated case, similar to a grocery store shelf and check for yeast, mold, microorganisms, over weeks/months for shelf life. He said that because I used vinegar, even if my pickles were left out on a counter, opened, they are not dangerous to eat at all. Eventually, he said, they would probably get soft and mushy (months later) and maybe eventually rotten and moldy, and a person would likely NOT eat them, but if they did, it wouldn't harm them.

The chutney (being a mixture of fruits, sometimes onions, peppers, spices, vinegar, and typically sugar) is boiled till 165 degrees, then hot-packed, or in the case of my chutney, is cooled, then packaged, then refrigerated. Mr. Johnson said I didn't need to refrigerate it, but I chose to for product consistency, and felt it was one more safety step.

Farmers know food probably better than anyone else. Pickling, or "putting up" an overabundance of produce, (like cucumbers, or green beans, peppers, etc.) is a way to extend that crop through the winter, and feed families. Once, when faced with about 2 lbs of jalapeno peppers, I complained to my mother as to what to do with them: "Put 'em in vinegar! They'll keep forever!" which is more or less true! You get awesome pickled peppers, and a spicy vinegar for salad dressings to boot! Vinegar is a natural barrier for bacteria and mold growth, as is lemon juice, or tomato based products.

With the overwhelming demand for locally grown and produced food, consumers want products made by hand, not mass produced. They want the old recipes and are returning to the tradition of stopping at a local farm stand or market for produce, and now cheese, milk, eggs, jams, and pickles. There are some key safety requirements written into this bill that make excellent sense. Water testing, a licensed food handlers certificate, restricted kitchen use during processing, will doubly ensure the safety of these acidified food products. The high cost of installing a full commercial kitchen has stopped most small farmers from doing so.

Farmers need to be able to diversify to stay in business. Many are barely making ends meet as it is. The passing of this bill would offer farm made products directly to the consumer, and would increase the income potential of Connecticut farmers: a win-win situation.